

MAY - 3 2016

UNITED STATES DISTRICT COURT

David J. Bradley, Clerk

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

Case Number: M-16-0818-M**Juan Jesus De Leon**
YOB: 1983
VSC

I, Nicholas J. Ilg, the undersigned complainant state that the following is true and correct to the best of my

Knowledge and belief. On or about May 02, 2016 in Hidalgo County, in
(Date)
the Southern District of Texas Defendant(s) did,

Knowingly and intentionally possess with intent to distribute approximately 4.50 kilograms of Cocaine, a Schedule II controlled substance, and did knowingly and intentionally conspire to possess with intent to distribute approximately 4.50 kilograms of Cocaine, a Schedule II controlled substance.

in violation of Title 21 United States Code, Section(s) 841(a)(1), 846.I further state that I am a(n) HSI Special Agent And that this complaint is based on the
Official Title
following facts:

See Attachment "A"

Continued on the attached sheet and made a part of this complaint: ☐ Yes ☐ No*Approved*
AUSA D.M. PAXTON
[Signature][Signature]
Signature of ComplainantNicholas J. Ilg Special Agent HSI
Printed Name of Complainant

Sworn to before me and signed in my presence,

May 03, 2016
Date8:44 am atMcAllen, Texas
City and StateU.S. Magistrate Judge Peter Ormsby
Name and Title of Judicial Officer[Signature]
Signature of Judicial Officer

Attachment "A"

On May 02, 2016 at approximately 8:20 P.M. a Mitsubishi bearing Texas license plate GYM6470, made entry into the United States from Mexico at the Progreso, Texas Port of Entry (POE). The owner, operator, and sole occupant was positively identified as Juan Jesus DE LEON. During primary inspection the Customs and Border Protection Officer (CBPO) received a negative oral declaration from DE LEON for contraband, to include narcotics.

DE LEON and the Mitsubishi were referred for secondary inspection. The console coverings were exposed, revealing several bundles consistent with narcotic packaging. A CBP Canine Enforcement Officer and his assigned canine (K-9) conducted an inspection of the Mitsubishi. The K-9 alerted the CBP Canine Enforcement Officer to the trained odor of narcotics, within the center console of the vehicle, where the bundles were located.

CBPO's extracted four (04) individually wrapped packages from within the Mitsubishi console. CBPO's examined and field drug tested a sample from each package. The field drug tests bore positive chemical characteristics of cocaine. The resulting weight of the four (04) packages consisted of approximately four-point-five (4.5) kilograms.

Homeland Security Investigations (HSI) McAllen Special Agents (SA) were contacted, advised of the incident, and responded to the Progreso POE.

HSI SA's advised DE LEON of his constitutional rights, in the English Language, on a Statement of Rights Document. DE LEON signed the rights document, affirming verbally and in writing that he understood his rights and wished to waive his rights.

DE LEON stated he entered Mexico with the sole intent to transport narcotics into the United States. DE LEON stated he observed the packaging of the cocaine and he had placed the bundles within the console. DE LEON stated he understood the total weight of the bundles to be approximately four (04) kilograms, and he was to be paid approximately ten-thousand dollars (\$10,000) to deliver the cocaine.